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June 19, 2014

VIA ECF AND FAX

Honorable Alvin K. Hellerstein  
United States District Judge, S.D.N.Y.  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Aldo Vera, Jr. v. The Republic of Cuba, 12 Civ. 1596 (S.D.N.Y.) (AKH)

Dear Judge Hellerstein:

We represent Banco Santander, S.A. ("Santander") in the above-captioned matter. We write with respect to the Amended Omnibus Petition for Turnover filed by Plaintiffs in the above matter on February 12, 2014 (the "Petition"), and the Notice Order for Turnover Proceeding filed March 27, 2014 (the "Notice Order").

Pursuant to the Notice Order, Santander sent notice of the Petition to certain third parties that may have an interest in certain blocked funds held at the New York Branch of Santander as to which Plaintiffs seek turnover (the "Funds"). To date, Santander has received no objections or other responses from the third parties to which notice was sent.

Santander notes, however, that in its Answer to the Petition dated March 11, 2014, Santander raised several objections to the Petition, including, among others, that: the Petition should be dismissed because there was no subject matter jurisdiction in the civil proceedings on which this turnover proceeding is based, and therefore the Court in this turnover proceeding lacks subject matter jurisdiction; Plaintiffs have not established that the Republic of Cuba or its agencies and instrumentalities (together, "Cuba") were the originator or originator's bank for the Funds, and therefore Plaintiffs improperly seek turnover of such Funds in Phase I of this proceeding; and to the extent the Funds consist of the proceeds of wire transfers routed through Santander as an intermediary bank, Plaintiffs have not established that wire transfer funds in the temporary possession of Santander as an intermediary bank are subject to attachment or turnover.

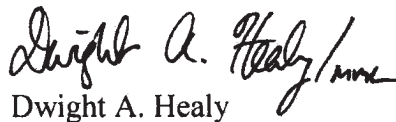
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Santander reiterates these objections to the Petition.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Dwight A. Healy" followed by a stylized flourish or initials.

Dwight A. Healy

DAH:mml

Cc: Counsel of record (via ECF)